

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
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This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,
04-cv-1706 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ.
IN SUPPORT OF MOTION TO ADD PARTIES AGAINST THE TALIBAN**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs the Estate of John P. O'Neill, Sr., John P. O'Neill, Jr., Christine O'Neill, Carol O'Neill, the Estate of Dorothy O'Neill ("O'Neill Plaintiffs"), and Additional Plaintiffs listed in Appendix 1 to Exhibit A (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Attached hereto as Exhibit A is a true and correct copy of the Proposed Amended Complaint. Appendix 1 to Exhibit A lists the Additional Plaintiffs.

3. As provided for in Federal Rule 24, attached hereto as Exhibit B is a true and correct copy of the Proposed Intervenor Complaint. Appendix 1 to Exhibit B lists the Additional Plaintiffs.

4. If the Court grants the Motion, undersigned counsel also requests that the Court allow individuals who retained Anderson Kill P.C. since the filing of the Motion but before the Court granted the Motion, to be added to the Amended Complaint without further order of the Court.

5. Undersigned counsel regularly receives phone calls and emails from 9/11 victims' family members and referral counsel requesting to join the MDL and wants to ensure individuals who retain Anderson Kill P.C. while this Motion is pending can join the case against the Taliban without further court intervention.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Parties Against the Taliban by amendment or supplementation or in the alternative, intervention.

Dated: February 11, 2022
New York, NY

/s/ Jerry S. Goldman

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